

the offender's portable tracking apparatus. The body worn device is non-removable and functions to confirm the location of the offender. See U.S. Patent 5,731,757 which was incorporated by reference into the present application for a structural description of the body worn device and portable tracking apparatus..

With respect to claim 2, applicant disagrees with the Examiner that "connectionless oriented" is misdescriptive. See the specification page 3, lines 13-19, page 5, lines 15-20, page 7, lines 3, and 9-14 for a thorough explanation of the term.

With respect to claim 3, "the communications" refers back to claim 1 for its antecedent. Claim 3 has been further amended to clarify the structure.

Claims 4 and 5 have been amended to clarify structure..


The language of claims 6 and 7 are believed to be complete, particularly as explained in applicant's U.S. Patent 5,731,757 for the memory card 42 and the algorithms set forth in FIGS. 2A-2E and 3A-3E in the present application..

With respect to claim 8, the structure for the language "receiving spatial coordinates", "sending messages through", "receiving responses from" are explained in detail in applicant's U.S. Patent 5,731,757 incorporated herein by reference. See item 60 for "receiving spatial coordinates", item 40 for "sending messages through", and item 54 for "receiving responses from".

With respect to claims 10, 11, 18, 19, 21 and 22 and the language "connection oriented circuit switched signals or connectionless oriented analog or digital wireless messages", see the present application's specification page 3, lines 13-19; page 5, lines 15-20 and page 7, lines 3 and 9-14.

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Claim 12 has been corrected with the Amendment set forth above.

Claims 13-15 have been amended to satisfy the Examiner's request.

The double patenting rejection has been met by a terminal disclaimer filed concurrently herewith. A courtesy copy is enclosed.

The Examiner has rejected claims 1-22 under 35 U.S.C. § 103(a) as being unpatentable over Hoshen. This rejection is respectfully traversed.

Hoshen relates to a system of offender tracking wherein the offender is frequently polled from a central database. See Hoshen, column 1, lines 56-67 and column 2, lines 1-2, lines 12-26 and lines 50-57. The Hoshen central data base must warn an offender or a potential victim. In contrast, applicant's warning system employs the offender's portable tracking apparatus for determining the offender's position and communicating simultaneously to a possible victim, a law enforcement entity, central data base and a supervisory authority, thus eliminating the steps of the central database polling the offender and then notifying the potential victim if the offender is too close. The absence of simultaneous communication in the Hoshen reference is acknowledged by the Examiner.

Hoshen's reference in column 4, lines 5-15 relates to a triangulation technique through three towers. The victim must answer after a position is determined. This has nothing to do with simultaneous notification of multiple parties from the offender's portable tracking device as in the present invention.

The law enforcement authority 26 and the victim 28 receives a signal from the central data base as described in column 4 of Hoshen. In the present invention, a real time position is sent directly from the offender's portable tracking device.

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The Hoshen conventional analog or digital system does not route directly from an offender's portable tracking device as in applicant's invention. Therefore, applicant's system is not conventional.

Applicant's connectionless system continues to send out notification signals. No such continuous notification is described in Hoshen.

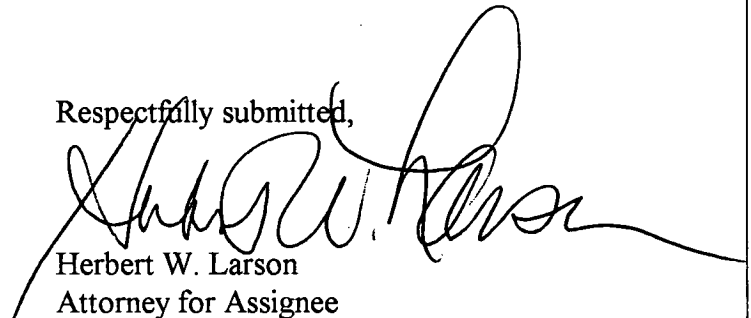
Applicant's redundant system is described on page 10, lines 15-17.

Considering Hoshen as a whole, it does not make applicant's simultaneous communication of tracking information of claim 1-22 obvious within the meaning of 35 U.S.C. § 103(a). Therefore, the rejection should be withdrawn.

The Hoffman patent, cited but not applied, relates to a system solely for signaling a central station.

In view of all the above, it is believed that claims 1-22 are in condition for allowance. Such action is earnestly solicited.

Respectfully submitted,



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